

LAW OFFICES

CUNLIFFE & COOK

210 Archbishop Flores St., Ste. 200

Hagåtña, GU 96910-5189

Telephone: (671) 472-1824

Telefax: (671) 472-2422

Attorneys for: Defendant

IN THE DISTRICT COURT OF GUAM

UNITED STATES OF AMERICA,)	CRIMINAL CASE NO. 20-00019
)	
Plaintiff,)	
vs.)	SUBMISSION OF LETTERS
)	IN SUPPORT OF
PATRICK ANTHONY BITONIO)	DEFENDANT'S SENTENCING
MANIBUSAN,)	
)	
Defendant.)	
_____)	

COMES NOW, Defendant PATRICK ANTHONY BITONIO MANIBUSAN, through the undersigned counsel, law offices of **CUNLIFFE & COOK**, A Professional Corporation, by Jeffrey A. Moots, Esq., and hereby submits for the court's review and consideration, a letter from Defendant and also from his family in support of his sentencing. Said letters are attached hereto and incorporated herein by this reference.

Respectfully submitted this 24TH day of May, 2021.

CUNLIFFE & COOK

A Professional Corporation

Attorneys for Defendant Patrick Anthony B. Manibusan

By


JEFFREY A. MOOTS, ESQ.

Patrick Anthony Manibusan

113 chalan kareta st.
NCS Dededo GU. 96929

May 21, 2021

Honorable Francis Tydingco Gatewood

United States District Court
520 W Soledad Ave,
Hagatna Guam 96910

Dear Hon.Judge Tydingco-Gatewood,

I am writing this letter to respectfully and humbly ask for leniency in my sentencing. I would like to start off by saying that I'm deeply remorseful of my actions of being an addict and easily pursued to do things for people that had no interest in my life. I'm very ashamed of having to go through all of this because I know better but that day I let my addiction take over me and my judgement..moving forward from all of that I had decided to turn my life around before I had any knowledge of being indicted in this case and worked hard to stay the course and most importantly to stay positive throughout this hardship before knowing that I was going to be indicted I got a job and enrolled in the lighthouse recovery center outpatient program but due to covid it was pushed back and I wasn't able to start until aug 24 2020 but I still stayed strong and stayed sober throughout the time I had to deal with the depression of having to go through this indictment and also the death of my father on may 28 2020 just a few days before scheduling of my magistration but with the grace of god my attorney was able to ask the courts to move it back due to the passing of my father which I was greatly thankful for. I'm humbly asking you your honor for leniency and hopefully you can see the person i really am and that i have changed my life for the better with completing and graduating my treatment program in feb 2021 proudly being able to say that I've been sober for 17 months and still gainfully employed for more than a year which I started from the bottom just being a laborer to now being a certified heavy equipment operator for black construction. I'm currently living and taking care of my elderly mom. It's just her and I living together and that's where most of my worries are at because she's all alone and no one to help her with the bills and take care of her physically because of her health. I understand I need to

answer to the courts for this matter and in all honesty your honor I'm ok with that because it's been so long that I've been stressing over this matter that I want to just get this over with so I can continue with my life, career, health, and recovery that I've worked so hard on for the past 17 months with that being said your honor I'm humbly asking you to consider me my hard work, my changed life, and my remorse for my actions in your sentencing.

Sincerely,

PATRICK ANTHONY BITONIO MANIBUSAN

Teresita B Manibusan

113 Chalan Kareta
NCS, Dededo

May 23, 2021

The Honorable Judge Frances Tydingco-Gatewood
US District Court Of Guam
Hagåtña, Guam 96910

Your Honor:

I am writing you this letter on behalf of my son Patrick Anthony B Manibusan who will appear before you on May 25, 2021 for sentencing on his drug charges. I know that he is guilty of these charges but would just like to beg of you to please consider putting him on house arrest for the duration of his sentence instead of sending off island. His father just passed away last year and since than he's been the only one staying with me at the house supporting me emotionally, physically, and financially. My son is a very caring, considerate and responsible person. Unfortunately he got involved in this monstrous "thing"! He honestly told me that he is remorseful of what he did and wants to continue being clean and to live a life that he can proud of. since his release from jail he we went through a drug rehabilitation program and received a certificate for it. He has been going in for testing and has been receiving negative results. Your Honor I hope that you can find it in heart to consider putting him on house arrest so I could feel safe and continue to support me emotionally, physically and financially.

Thank you very much your Honor for your consideration and my god bless you.

Very Truly Yours,

TERESITA B MANIBUSAN
(Mother of Patrick Anthony B Manibusan)

Margaret M Herrera

1800 Fisler CT

Honolulu, HI 96818

May 21, 2021

RE: Patrick A B Manibusan

The Honorable Judge Frances Tydingco-Gatewood

US District Court Of Guam

Agana Guam 96910

Your Honor:

I am writing this letter on behalf of my brother Patrick Anthony B Manibusan. For all the years that I've known my brother he has always been a responsible, kind, loving, caring and supportive individual. Unfortunately he got into a messy situation. Since he got out of jail he stayed with my mom and dad and has been doing so good. My dad had passed last year and it's just been him and my mom living together. He supports my mom emotionally, physically and financially. He is my mom's right hand. It will be devastating to us if he has to go off island especially for my mom. My husband is in the Navy and we are currently stationed in Pearl Harbor Hawaii which makes it difficult for me to watch over my mom. Your Honor I ask and beg for your kind consideration to put him on house arrest instead of sending him off island so he could be with my mom to continue to support her emotionally, physically and financially.

Respectfully Yours,

Margaret M Herrera

(Sister of Patrick Anthony B Manibusan)

Hafa Adai,

My name is Sieyenna and I'm the niece of Patrick Manibusan.

Growing up, my Uncle Pat and I had a really close bond. It was always fun and laughter, never ever a dull moment. He's that type of uncle where you can just be yourself and he won't judge you.

Unfortunately that bond broke once he stepped into the wrong path. Although my Uncle Pat used drugs and did other stuff, I truly believe that he's a good man. He's never did anything to hurt our family nor bring in the things he was doing around us. I know for a fact that he's a good person with good intentions, however a mistake happened and it took over his life for a few years.

Over the past year, I've seen my Uncle Pat be the best he could be. From the day he got released, he promised us that he was done and wants to become better. Till this day, he's a man of his word. I could only imagine how hard it must be for him but I idol him for doing what a lot of people in that situation aren't able to do.

With this letter, I hope it helps whoever is reading it, understand that my Uncle Pat is a true changed man. He is the best version of himself, and I hope he continues to do so. Everyone makes mistakes, but props to him for owning up to his mistakes and deciding to serve his time.

I am in hope that this letter helps my Uncle Pat. I stand by him, I believe in him, and most especially I love him.

With best regards,
Sieyenna Gutierrez

Robert A. Gutierrez
PMB 696
1270 N Marine Corps Dr STE 101
Tamuning, Guam 96913

Court Date: May 25, 2021

The Honorable Judge Frances Tydingco-Gatewood, Supreme Court of Guam

Your Honor,

I write this letter for consideration of leniency towards Patrick Manibusan, as to every action there is results with positive or negative outcomes. And in this situation your honor, Patrick action did bring negative results. Certain negative results require **hard punishment** and others are considered **lesson learned**. And this is where I humbly ask your honor that Patrick action with my upmost respect to the Law of the lands, those that Protect and Serve, our community and yourself that his actions be considered a **lesson learned**. If you were to ask me what the lesson is learned here? I would say that Patrick understands the actions must result in positive outcome to the well being of our community, our family and himself. Within 1 year his actions has produce positive results such as acquiring a job and within this company he was promoted to another level of expertise based on his work ethics. His presence and support have helped our family emotionally and financially most especially during these difficult months due to our loss of my Father-in-law and pandemic effects. He has joined recovery groups that has shed the light of faith and hope which in term bring smiles and happiness I see every day.

In closing "your honor", I ask with my upmost respect in my most humbly tone that Patrick continues the positive results.

With great respect,

Robert A. Gutierrez (Brother-in-Law)

Suzette M. Gutierrez
PMB 696
1270 N Marine Corps Drive STE 101
Tamuning, Guam 96913

Court Date: Tuesday, 25 MAY 2021

The Honorable Judge Frances Tydingco-Gatewood, Supreme Court of Guam

RE: PATRICK A.B. MANIBUSAN

Your Honor,

I am writing on behalf of Patrick A.B. Manibusan who will be appearing before your court on, Tuesday, 25 MAY 2021 I am the eldest sibling to Patrick amongst four. And I am sincerely writing to vouch for the character of my brother, Patrick.

Amongst my siblings, I am the one who has seen my brother walk in the different paths of his life. Patrick has indeed made choices that have brought him to struggle with the circumstances and negative situations in his life. Choices that have landed him into prison and to face the court systems. Despite the bad choices and challenges Patrick faces, he has always had a genuine support system that was always ready to help him redirect and make the positive changes in his life. And has always showed empathy for the negative character he once possessed. Although it has been challenging and heartbreaking during the times, he has chosen the addict path, we remained confident that one day he will turn back and want to make that positive change. Patrick's character has always been that of a dependable, hardworking, determined, and strong willed.

Within the last year and three months, my husband, children, and myself have seen Patrick work endlessly and actively to walk the path of recovery. My Brother has indeed stayed off the path that we, his family has hoped for and that he possesses the desire and determination to stay on this positive and healthy path. He has been working long hours and was recently promoted to a higher position within his employer. He has been involved a lot with family and has shown so much positive changes in his lifestyle. I believe the greatest influence for Patrick to remain on this positive path is that he realizes now, how strong his support system is, and most especially since the passing of our father, last year. Patrick is now the immediate caretaker of our mother, whom he resides with. Patrick is also an Uncle our kids can depend on. His fun, loving, thoughtful and caring characteristic is what my children love and adore their Uncle for.

If Patrick is sentenced to serve for the crime he has committed, we, his family will be there for him. If You, Your Honor rule to keep him on probation with restrictions, we, his family will do everything in our power to help keep his desire and determination strong for a positive lifestyle. Although Patrick has prepared himself for the worst, it is our prayer that your court considers a lighter sentencing for Patrick as this will give him the greatest opportunity to continue to make his life better and chase after the opportunities for success, which I know he so heartfully desires.

Thank you, Your Honor for your time and kind consideration.

Sincerely,
Suzette M. Gutierrez



Aron Miles Luna
11680 W Luxton Ln
Avondale, AZ, 85323

May 23, 2021

RE: Mr. Patrick Manibusan Character Letter

Your honor,

I am writing on behalf of Mr. Patrick Manibusan, my brother-in-law. I have known Patrick for nearly 17 years, and through these years, Patrick has shown what a great character and person he truly is.

When I first met Patrick, he was a charming person to be around. Patrick is a very loving guy that cares deeply for his family, the Island, and his community. That is why it pained me to see Patrick during his dark days; I saw a side of Patrick that I knew he hated, but like many, he got lost. But since then, I now see the old Patrick. The Patrick before his lapse in judgment. The Patrick that everyone loves, the one that has an infectious smile and loving heart.

Since his mistake, Patrick has shown a steadfast change of behavior while dealing with the passing of his father. During those tough days, I was worried about him relapsing, but Patrick was resilient as he did what he knew he had to, take care of his mother while holding down a great job with Black Construction.

Patrick has made a complete turnaround, and it is with hope the court will consider his honest rebound in life while deciding his case.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aron Luna', with a stylized, cursive script.

Aron Luna

To Whom it May Concern,

My name is Antoinette M. Luna and I am the sister of Patrick AB Manibusan. It is with my sincere hope in writing this letter to share the journey to recovery for my brother.

I have known my brother Patrick to be a sweet, caring and giving person. Throughout the years growing up, considering we are the closest in age amongst our siblings, Patrick has always been a person of good heart and intentions. Unfortunately, there was a time in his life that he turned to drugs and making bad decisions based on his current life situations. During that timeframe of him struggling in life, I have always had faith that he would overcome this darkness and be resilient in bouncing back up from whatever had brought him down.

Since being out and sober, he has stepped up and cared for my father who passed away a year ago (2020) this week. He has also become more involved with the family by taking over the responsibilities providing and caring for our mother whom he is currently residing with.

While it is unfortunate that he has made some bad decisions, it is to no surprise that he has taken full responsibility of his actions and is wanting to move forward to be a better person that he has been growing up. I believe and trust that he will remain positive and emerge to being the best he can be by overcoming his past. I also say this because I've seen firsthand that my brother Patrick has expressed a deep sense of remorse for making such serious mistakes and missing out on the good life that he was meant to have. He has definitely shown me this change and I believe in his journey for moving forward, learning from his mistakes.

Kindly requesting to take into consideration this letter. Thank you so much for your time in reading my letter.

Very Respectfully,

A handwritten signature in black ink, appearing to read 'Antoinette M. Luna', with a stylized, cursive script.

Antoinette M. Luna

618-803-2966 (Cell Phone)

Haley Manibusan Herrera

113 chalan kareta st.
NCS Dededo GU. 96929

May 21, 2021

Honorable Francis Tydingco Gatewood

United States District Court
520 W Soledad Ave,
Hagatna Guam 96910

Dear Hon. Judge Tydingco-Gatewood,

I am writing to you on behalf of my Uncle Pat. When I found out about what he had done I felt sorry for him because I know deep down he knew he was in the wrong. I am asking you to please think about lessening his sentence because my Nana is all by herself at home. My Papa passed away last year during covid which made it harder for the family to gather and mourn for our loss. But last year was my first time back and seeing everyone and during that time I got to see my Uncle Pat's accomplishments and see how well he was doing. I am currently back on island and seeing him strive even more makes me and my family very happy. What he did was clearly wrong and of course there are consequences but I kindly ask you to think about my Nana and who he is leaving behind if and when he leaves.

Sincerely,

Haley Manibusan Herrera